

Exhibit 3

From: [Brennan, Jessica L.](#)
To: [Matthew Yeziarski](#)
Subject: RE: J&J TALC Litigation Questions
Date: Wednesday, October 14, 2020 7:57:03 AM

[EXTERNAL]

Matt,

We do not agree to withdraw the motion as to Adkins, Amato, or Housley. The cases are subject to the motion to dismiss because plaintiffs did not cure the deficiencies and/or did not show cause as to why the deficiencies cannot be cured per the September 17 and 19 orders. As to Adkins, the PPF remains materially deficient for failure to respond to No. 11. Given that Ms. Amato and Ms. Housley both passed away recently, we will agree to remove the cases from the discovery pool and, after the stipulations are signed and filed, withdraw the motion as to those cases only. Please advise.

Thanks,
Jessica

Jessica L. Brennan

Partner

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From: Matthew Yeziarski <MYeziarski@johnsonlawgroup.com>

Sent: Tuesday, October 6, 2020 12:53 PM

To: Brennan, Jessica L. <jessica.brennan@faegredrinker.com>

Subject: RE: J&J TALC Litigation Questions

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Jessica,

Thank you for your quick response to my message. I will get the motion to substitute filed today and will await your response on the MTD cases.

Thank you again! Have a great day!

Matt

Matthew S. Yeziarski | Attorney

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From: Brennan, Jessica L. <jessica.brennan@faegredrinker.com>

Sent: Tuesday, October 6, 2020 11:46 AM

To: Matthew Yeziarski <MYeziarski@johnsonlawgroup.com>

Subject: RE: J&J TALC Litigation Questions

[EXTERNAL]

The J&J defendants will not oppose the motion to substitute. I will look at the motion to dismiss cases and get back to you. Thanks.

Jessica L. Brennan

Partner

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From: Matthew Yeziarski <MYeziarski@johnsonlawgroup.com>

Sent: Tuesday, October 6, 2020 11:49 AM

To: Brennan, Jessica L. <jessica.brennan@faegredrinker.com>

Subject: J&J TALC Litigation Questions

This Message originated outside your organization.

Hello Jessica,

I got your e-mail information from Leigh O'Dell and wanted to touch base with you about a couple of things related to the J&J Talcum Powder litigation.

First, I wanted to introduce myself and let you know that I have taken over the Talc docket from Kori Westbrook, Caryn Papantonakis, and Ashley Tizeno here at JLG.

That brings me to my second point. I am preparing to file the attached Motion for Substitution so that I can be listed as the lead attorney on all of the JLG TALC cases. I had e-mailed Susan Sharko to see if Defendants would allow me to file it as an UNOPPOSED motion, but I have not gotten a response. Is this something that I should discuss with you? Or can you let me know who to reach out to on this issue?

Finally, there is the pending MTD. JLG has 3 cases listed on the pending motion and I wanted to discuss them briefly.

1. Adkins, Bernadine – Not sure why this one is on the list. Her records were uploaded on 9/2/20 and the PPF was amended and the HIPAA and Verification were filed on the 9/3/20. This one is not deficient.
2. Amato, Felicia – This client passed away. A letter was sent to Defense counsel via MDL Centrality and a Suggestion of Death was filed with the Court. We are working on communicating with the appropriate party to file a motion for substitution to continue the case. Therefore, this case should not be subject to the MTD at this time.
3. Housley, Yvonne – This client also passed away. A letter was sent to Defense counsel via MDL Centrality and a Suggestion of Death was filed with the Court. We are working on communicating with the appropriate party to file a motion for substitution to continue the case. Therefore, this case should not be subject to the MTD at this time.

Given these circumstances, I am hopeful that we can have these 3 cases removed from the motion. If however, I need to prepare individual responses in these cases to file with the court, I will get started on that, but to be honest, I would prefer to avoid that if possible.

Thank you in advance for your time and your attention to these matters. It is a pleasure to “meet” you and I look forward to working with you on this matter. Have a terrific Tuesday!!

Matt

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